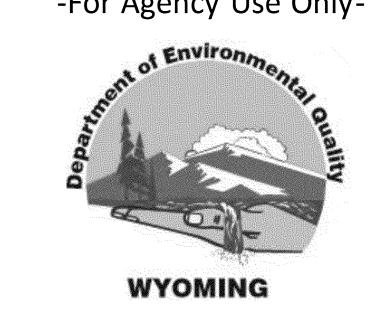
Phase VI: Short-term Investigation of Groundwater Quality in the Pavillion, WY Area

July, 2012 - Deliberative --For Agency Use Only-



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Project Planning Tasks

- Review Pavillion Gas Field data from DEQ, EPA, WOGCC, SEO, and BLM
- Identify data gaps and areas for potential additional investigation
- Further investigate the nature and extent of groundwater contamination within Areas of Interest (AOIs)
- Continued sampling of DWWs within Areas of Interest
- Project cost estimation

Assumptions & Considerations

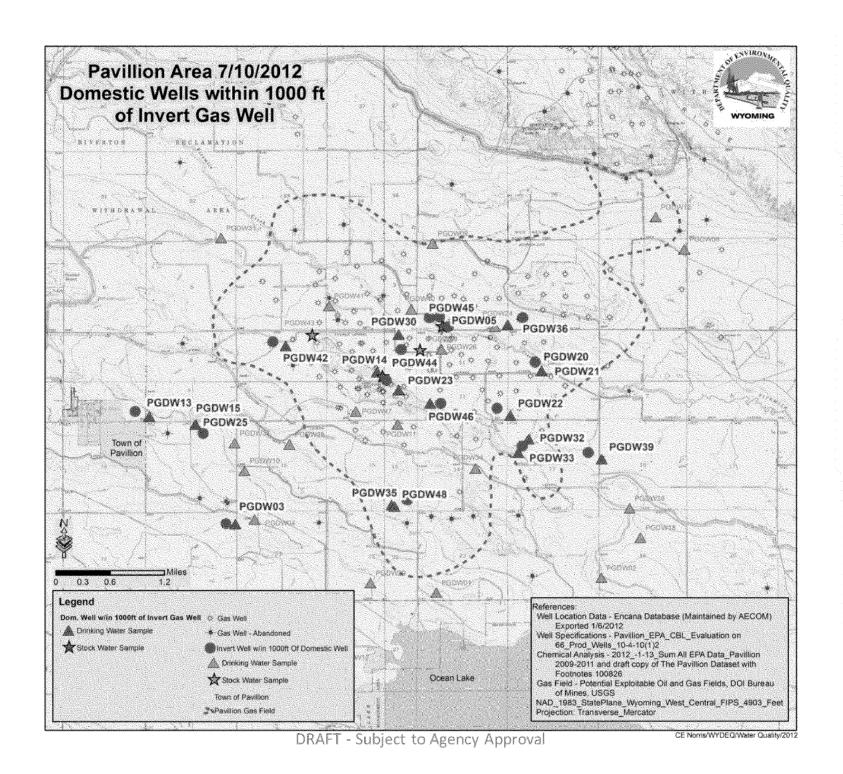
- All work to be completed by outside contractors under the direction and oversight of DEQ
- All work shall comply with applicable statutory and regulatory requirements
- Procedures for well drilling, construction, installation, development, QA/QC, sampling and analysis shall be required and approved by DEQ prior to commencement of activities
- Monitor wells to be constructed of 2" stainless steel, minimum
- Costs have been reasonably estimated but may differ considerably from actual costs
- Contingency costs (e.g. inclement weather, etc.) have not been included
- Drilling costs do not include rental for required blow-out prevention during drilling activities
- Assumed regional GW flow direction is generally to the Southeast; site specific GW flow direction may differ from regional flow as influenced locally by topography, irrigation activities & other surface water features
- Inventory of potential sources of contamination within 500 feet (minimum) of monitor well locations will be completed by DEQ
- Actual monitor well locations may differ from those proposed, based upon closer evaluation
- Production pit ranking (potential impacts to groundwater) were determined by review of Pit Working Group documentation
- Gas wells have been depicted on figures, however, additional field investigation is required to make a definitive identification of well name and location

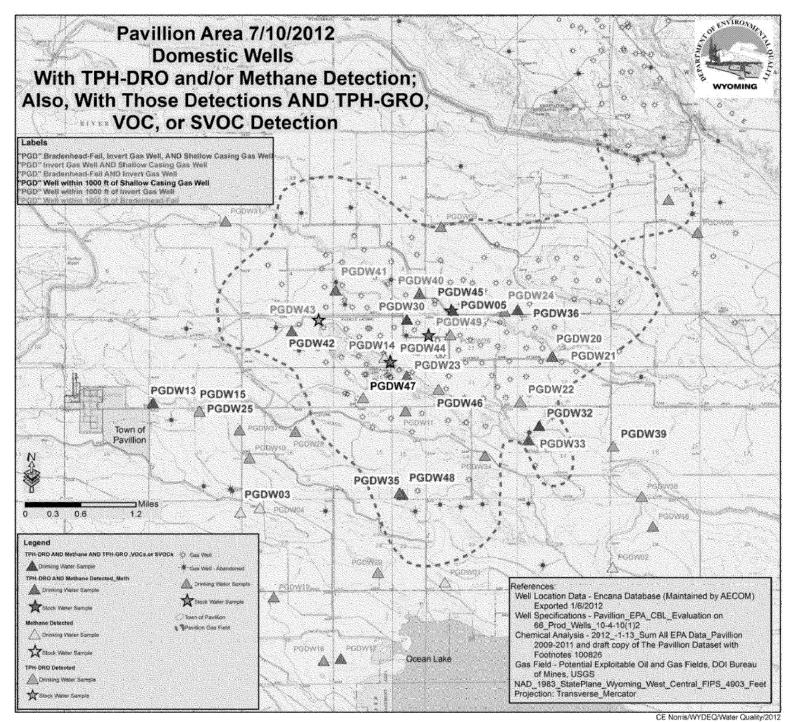
Sources of Data

- WOGCC Bradenhead Test Data
- WOGCC Online Database
- Draft EPA Pavillion Report
- Pavillion Working Group Tables
- WDEQ GIS Figures (various data sources)
- WDEQ VRP and Tribal Pavillion files
- SEO e-Permit files

DWW Screening Criteria

- Is the Domestic Water Well (DWW) located within 1,000' of an invert well?
 - Invert well: gas well drilled w/diesel-based drilling fluid
- Is the DWW w/in 1,000' of a production pit?
- Is the DWW installed deeper than the surface casing w/in 1,000' of nearby gas well(s)?
- Is the DWW w/in 1,000' of a gas well where Bradenhead test showed pressure on the well annulus?
- Did the DWW exhibit the presence of methane, TPH/DRO/GRO, VOCs and SVOCs?





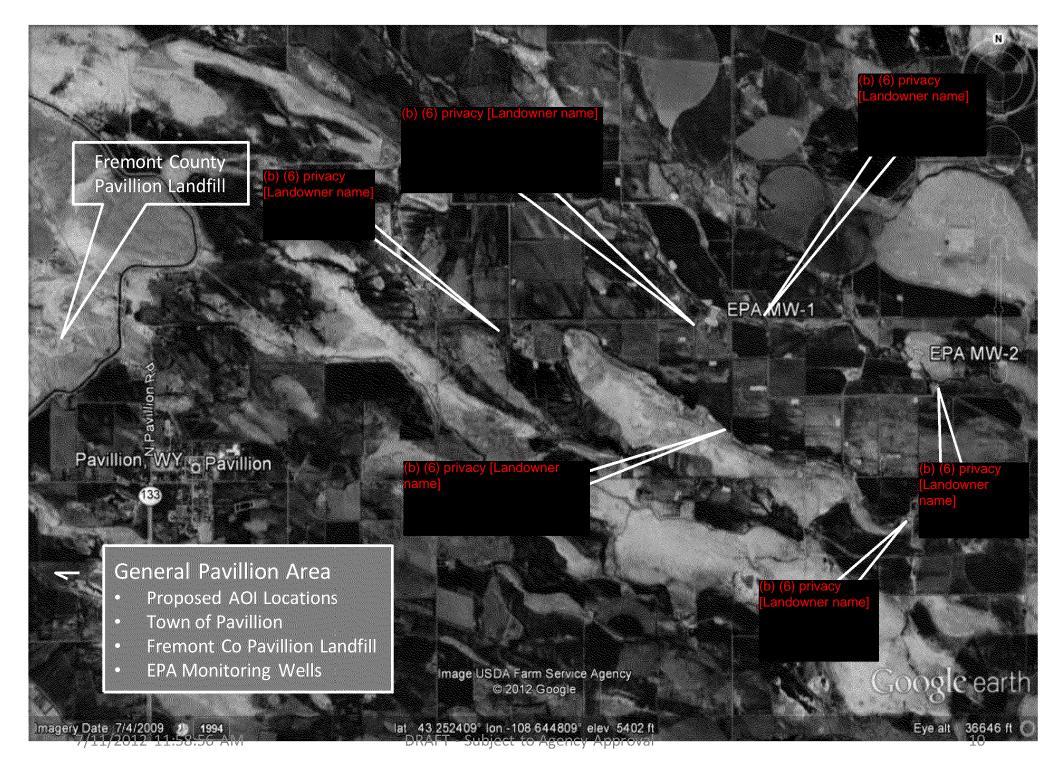
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DWW Screening Results

Six Locations Met the Screening Criteria

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- AOI #1: (b)(6) privacy [Landowner name] Area
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- AOI #2: (b)(6) privacy [Landowner name]
- AOI #3: (b)(6) privacy [Landowner name] Area
- AOI #4: (b)(6) privacy [Landowner name]
- AOI #5: (b)(6) privacy [Landowner name]
- AOI #6: (b)(6) privacy [Landowner name]



INVESTIGATION PLAN FOR AOIS

INVESTIGATION PLAN FOR AOIS

DOMESTIC WELLS

- 1. Down hole camera of DWWs to verify screened intervals
- 2. Sample domestic water wells within AOI for a minimum of two events prior to installation of monitoring wells
- 3. Conduct survey of land uses for other potential sources during DWW sampling in AOIs
- 4. All DWWs sampled for TPH-DRO and DRO with silica gel cleanup, BTEX, metals, and general chemistry
- 5. Additional wells sampled for TPH-GRO, VOCs, and/or SVOCs as necessary
- 6. Field Parameters
- 7. Conduct QAQC analysis on data
- 8. Review results prior to installation of monitoring wells

MONITORING WELLS

- 1. Conduct hydrophysical testing on wells to determine stratigraphic flow-regimes and use data to determine placement of well screened intervals
- 2. Initial sampling of monitoring wells for TPH-GRO/DRO, DRO with silica gel cleanup, VOCs, SVOCs, metals, and general chemistry
- 3. Semi-annual sampling of constituents of concern based on initial sampling results
- 4. Semi-annual sampling of monitoring wells at same time as DWWs
- 5. Select an upgradient MW location outside of O&G activities for background WQ sampling
- 6. Gas mudlogging of MW installations, if applicable

POTENTIAL CONCERNS

- 1. Landowner access agreements for sampling of DWWs and and installation of MWs
- 2. Drilling method (sonic, mud rotary, air rotary) to select; potential for encountering methane; need for blow-out preventers.

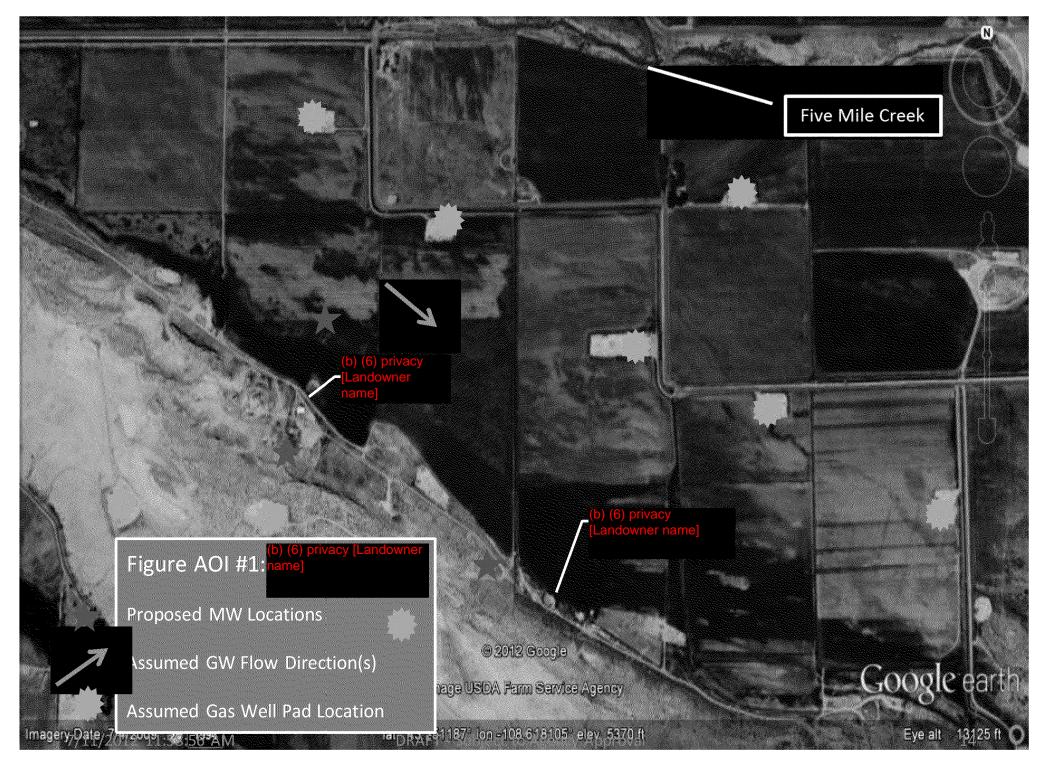
AREA OF INTEREST #1:

(b)(6) privacy [Landowner name] AREA

(AOI #1:

(b)(6) privacy [Landowner name]

Area)



AOI #1: (b)(6) privacy [Landowner name]

BACKGROUND INFORMATION

- DWWs Total Depths (TD): well (PGDW 14) 190-ft bgs, well (PGDW 23) 500 ft-bgs, In-laws stock well (PGDW44) 750-ft bgs
- 32-10c (4,020' TD; 1,920' 1,925' and 3,476' 3484' perf zones; surface casing 8 5/8" to 626')
- 44-10 (5,200' TD; no perforation information; surface casing 8 5/8" to 625'; no cement information)
- 33x-10, invert well, (6,000' TD plug back to 5893'; 5,126' 5,490' perf zone; surface casing 85/8'' to 514')
- 32-10c and 44-10 failed Bradenhead test, 33x-10 passed
- Production Pits at 33x-10 (32-10 shared?) and 42-10
- Invert well and production pits 33x-10 w/in 1,000 feet of (b)(6) privacy [Landowner residences
- Methane detected in all three domestic wells, TPH-DRO detected in and In-law wells (not tested for TPH-DRO). Toluene and benzoic acid (j-flagged) detected in in-law well

RECOMMENDATIONS

- In-law wells semi-annually (pre-irrigation time frame and during irrigation Sample period)
- Installation of three sets of wells, nested at minimum of four depths (approx 50 ft, 200 ft, 500 ft, and 750 ft)
- Sampling & monitoring of the proposed MW's
- Further onsite investigation necessary to definitively locate & label all gas wells

Note: DWW ID Number in () is EPA identification for sampling.

AREA OF INTEREST #2:

(b)(6) privacy [Landowner name]

(AOI #2: (b)(6) privacy [Landowner nan



AOI #2: (b)(6) privacy [Landowner name

BACKGROUND

- DWW TD: (PGDW05) 207-ft bgs, (PGDW45) 100-ft bgs
- 14-2, invert well, (5,250' TD; 3,767'- 4,962' perf zone; surface casing depths 18" to 47' and 8 5/8" to 599')
- 13-2, invert well, (3,400' TD; 2,811'-3,040'perf zone; 8 34" surface casing to 404')
- 24-02, invert well, (3,942' TD; 1,538' 1,550' and 3,874'-3,878' perf zones; 9 7/8" surface casing to 562')
- 13-2 failed Bradenhead test, 14-2 and 24-02 passed
- Production pits at 13-2 and 14-2, no information on 24-02
- Invert wells and production pits within 1000 ft of wells
- Pit 14-2 in VRP, but on hold, sampling data not submitted to VRP? Large gas flow was observed to pit. Drill cutting buried in reserve pit
- Methane and TPH-DRO detected in both wells, TPH-GRO detected in well (PGDW05)

RECOMMENDATIONS

- wells semi-annually (pre-irrigation time frame and during irrigation period)
- Installation of two sets of wells, nested at minimum of three depths (~50 ft, ~200 ft, and ~300 ft)
- DWWs and MWs: add TPH-GRO to analytical list for this area
- Sampling & monitoring of the MW's

AREA OF INTEREST #3:

(b)(6) privacy [Landowner name] AREA

(AOI #3:

(b)(6) privacy [Landowner name]

Area)



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AOI #3: (b)(6) privacy [Landowner name]

Area

BACKGROUND

- stock (PGDW49) 50-ft bgs; (PGDW30) 260-ft bgs DWW TD:
- 41x-10, invert well, (5,047' TD; 3,825' 4,855' perf zone, 8 5/8" casing to 619')
- 41-10 (3,180' TD plug back to 3,165'; 1,618' 3,152' perf zone, 7" casing to 534')
- 41-10B (3,841 TD plug back to 3,475'; 1,792'-3,024' and 3,545'-3,614' perf zones; 7" casing to 640')
- 42-10 (5,995' TD plug back to 5,932'; 5,403' 5,476' perf zone; 8 5/8" casing to 626'), produces oil
- 42-10B (5,605' TD; 1,890'-1,902' and 4,855'-4,859 perf zones; 7" casing to 621')
- 31-10 (5,972' TD plug back to 5,675'; 3,335' 4,689' perf zone; 8 5/8" casing to 598'), produces oil
- Production pit at 42-10 drill cuttings disposed onsite. No pit investigation information for the 42-10 or 41-10 locations.
- 41-10, 31-10, 42-10B failed Bradenhead tests, 41-10B and 41x-10 no Bradenhead test conducted, 42-10 passed
- Invert well located within 1,000 ft of and
- Methane and TPH-DRO detected in both wells, TPG-GRO and benzoic acid (j-flagged) detected in well

RECOMMENDATIONS

- Review data from USGS sampling of EPA MW01
- Verify if EPA MW01 can be utilized in sampling program
- Sample DWWs semi-annually (pre-irrigation time frame and during irrigation period)
- Installation of one set of wells, nested at minimum of three depths (approx 50 ft, 260 ft, and 500 ft)
- DWWs and MWs: add TPH-GRO to analytical list for this area

AREA OF INTEREST #4:



(AOI #4: Area)



AOI #4:

(b)(6) privacy [Landowner name]

BACKGROUND

- DWWs TD: privacy (PGDW42) 200-ft bgs, privacy ? (PGDW43) 100-ft bgs
- 21-9, invert well (5,304' TD; surface casing to 815'; no perf zone info), abandoned
- 31-9 (3,445' plug back to 3,350'; 2,313'-3,312' perf zone, 7" casing to 534'), produces small amount
 of oil
- 41-9 (5,200' TD; no perf zone information; 8 5/8" casing to 604'), produces small amount of oil
- 31-9 and 41-9 Bradenhead test passed
- Production pits at 21-9 and 31-9 being investigated
- Production pits and invert well within 1,000 (b) (6) privacy
- Methane, benzene (j-flagged), napthalene (j-flagged), and phenol detected in 200' well (low level), TPH-DRO detected in both wells

RECOMMENDATIONS

- Sample DWWs semi-annually (pre-irrigation time frame and during irrigation period)
- Installation of one set of wells, nested at minimum of four depths (approx 50 ft, 100 ft, 200 ft, and 300 ft)

AREA OF INTEREST #5:

(b)(6) privacy [Landowner name]

(AOI #5: (b)(6) privacy [Landowner name



AOI #5:

(b)(6) privacy [Landowner name]

BACKGROUND

- DWW TD: (PGDW20), (PGDW21) both 460' (?), (LD02) 610'
- 22-12, invert well, (5,200' TD; 3,510' 4,998' perf zone; surface casing to 586')
- 13-12 (3,275' TD plugged back to 3,150'; 2,170' 3,125' perf zone; surface casing to 327')
- 12-12 (3,955' TD; 1,964'-2,025' and 3,645'-3,862 perf zones; 7" casing to 635')
- 22-12, 13-12, and 12-12 passed Bradenhead tests
- Invert well and production pits located within 1,000 ft of wells
- Methane detected in all three wells (low level), TPH-DRO detected in PGDW21 and LD02;
 BTEX (j-flagged) detected in LD02; 2-BEP and benzoic acid (j-flags) detected in PGDW20 and LD02; 1,2,4-TMB and 1,3,5-TMB (j-flags) detected in LD02

RECOMMENDATIONS

- Sample DWWs semi-annually (pre-irrigation time frame and during irrigation period)
- Installation of two sets of wells, nested at minimum of four depths (approx 50 ft, 100 ft, 450 ft, and 650 ft)
- DWWs and MWs, add VOCs to sampling for this area
- Sampling & monitoring of MW's

AREA OF INTEREST #6:

(b)(6) privacy [Landowner name]

(AOI #6: (b)(6) privacy [Landowner name



AOI #6:

(b)(6) privacy [Landowner name]

BACKGROUND

- DWW TD: (PGDW32) 674', (PGDW33) 30', (PGDW34) 100'
- 11-13 (5,500' TD; expired permit, no records)
- 12-13, abandoned (5,331' TD plugged back to 3,351'; 3,300' 3,462' perf zone; surface casing to 576')
- Invert well and production pits located within 1,000 ft
- 12-13 failed Bradenhead test (?), P&A'd in 2001
- Methane detected in PGDW32 and PGDW34 (PGDW33 not sampled), TPH-GRO and DRO detected in PGDW32 (PGDW33 and PGDW34 not sampled)

RECOMMENDATIONS

- Sample DWWs semi-annually (pre-irrigation time frame and during irrigation period)
- Installation of one set of wells, nested at minimum of four depths (approx 30 ft, 100 ft, and 675 ft)
- Sampling & monitoring of MW's

SEMI-ANNUAL DWW AND MW SAMPLING WITHIN THE AOIS

Semi-Annual DWW Sampling (15 DWWs within AOIs)

- Sampling Labor (1 Event) \$6,500
 - Assumes 1 field tech @\$80/hr; minimum 3 DWW's sampled/10 hr day
 - 2 travel days of 6 hrs/day; 6 days per diem @\$145/day
 - Vehicle for 8 days @\$90/day
 - Field equipment for 6 days (horriba @\$300/wk, O/W probe \$150/wk, pump @\$300/wk)
 - Assumes all DWW's sampled in same mobilization
- Laboratory (15 Units)

	TPH-DRO (15 units)	\$1,125
	TPH-GRO (7 units)	\$525
	TPH-DRO silica gel (15 units)	\$1,125
	 Metals, General Chemistry (15 units) 	\$375
	VOCs (6 units)	\$2,250
	 Methane Headspace (15 units) 	\$1,500
	– QA/QC samples/event	\$2,750
•	Total for 1 DW sampling event	\$16,150
•	Total for 2 events	\$32,300

Semi-Annual MW Sampling

(10 MWs and 1 EPA well within AOIs)

- Sampling Labor (1 Event) \$6,320
 - Assumes 1 field tech @\$80/hr; minimum 3 MW's sampled/10 hr day
 - Request two field techs for safety considerations
 - 2 travel days of 6 hrs/day; 6 days per diem @\$145/day
 - Vehicle for 6 days @\$90/day
 - Field equipment for 6 days (horriba @\$300/wk, O/W probe \$150/wk, pump @\$300/wk)
 - Assumes all MW's sampled in same mobilization
- Laboratory (11 Units)

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_	TPH-DRO (11 units)	\$825
_	TPH-GRO (11 units)	\$825
_	TPH-DRO silica gel (11 units)	\$825
_	Metals, General Chemistry (11 units)	\$275
_	VOCs (11 units)	\$1,650
_	SVOCs (11 units)	\$2,970
_	Methane Headspace (11 units)	\$1,100
_	QA/QC samples/event	\$2,750
Total for 1 MW sampling event		\$17,540
Total for 2 events		\$35.080

OPTIONAL ADDITIONAL GROUNDWATER INVESTIGATIONS



OPTIONAL ADDITIONAL INVESTIGATIONS

Site #1 PAVILLION LANDFILL

Issue: Review of available groundwater data near the former Pavillion landfill shows a lack of down gradient sampling data. Pavillion landfill is likely hydrologically up gradient of the Pavillion Gas Field, and was unlined.

- Install one or two monitoring well sets down gradient of the landfill
- Semi-annual sampling of wells for TPH-GRO and DRO, VOCs, SVOCs, Metals, and General Chemistry

Site #2 PIT

Issue: This facility was closed as per WOGCC requirements and is not in the VRP. The GW was not sampled.

- Install two monitoring well sets down gradient of the pit
- Semi-annual sampling of wells for TPH-GRO and DRO, VOCs, SVOCs, Metals, and General Chemistry

Costs were not included in the final estimation for AOI investigation

- 4 MW's of 80'-100' depths each
- No gas mudlogging required; GW monitoring only
- Estimated Total Cost: \$95,000

Attachment 1

ESTIMATED COSTS FOR PHASE VI (MONITOR WELL INSTALLATION, DWW and MW SAMPLING)

ESTIMATED COSTS FOR PHASE VI (MONITOR WELL INSTALLATION, DWW and MW SAMPLING)

MW Installation Estimate \$2,278,054

DWW Sampling Estimate \$ 32,300

MW Sampling Estimate \$ 35,080

Estimated Total Cost \$2,345,434

Monitor Well Installation Estimated Costs

• Total \$2,278,054

- The projected estimate includes the following:
 - MW Drilling & Completion
 - Project Management & Draft/Final Reports
 - Geological Services & Equipment
 - Hydrophysical Testing of Deep Borehole
 - Access Issue Expenses
 - Drill Cuttings & Produced Water Disposal Costs

SEMI-ANNUAL DWW AND MW SAMPLING WITHIN THE AOIS

Semi-Annual DWW Sampling (15 DWWs within AOIs)

- Sampling Labor (1 Event) \$6,500
 - Assumes 1 field tech @\$80/hr; minimum 3 DWW's sampled/10 hr day
 - 2 travel days of 6 hrs/day; 6 days per diem @\$145/day
 - Vehicle for 8 days @\$90/day
 - Field equipment for 6 days (horriba @\$300/wk, O/W probe \$150/wk, pump @\$300/wk)
 - Assumes all DWW's sampled in same mobilization
- Laboratory (15 Units)

	TPH-DRO (15 units)	\$1,125
	TPH-GRO (7 units)	\$525
	TPH-DRO silica gel (15 units)	\$1,125
	 Metals, General Chemistry (15 units) 	\$375
	VOCs (6 units)	\$2,250
	 Methane Headspace (15 units) 	\$1,500
	– QA/QC samples/event	\$2,750
•	Total for 1 DW sampling event	\$16,150
•	Total for 2 events	\$32,300

Semi-Annual MW Sampling

(10 MWs and 1 EPA well within AOIs)

- Sampling Labor (1 Event) \$6,320
 - Assumes 1 field tech @\$80/hr; minimum 3 MW's sampled/10 hr day
 - Request two field techs for safety considerations
 - 2 travel days of 6 hrs/day; 6 days per diem @\$145/day
 - Vehicle for 6 days @\$90/day
 - Field equipment for 6 days (horriba @\$300/wk, O/W probe \$150/wk, pump @\$300/wk)
 - Assumes all MW's sampled in same mobilization
- Laboratory (11 Units)

TPH-DRO (11 units)	\$825
TPH-GRO (11 units)	\$825
 TPH-DRO silica gel (11 units) 	\$825
 Metals, General Chemistry (11 units) 	\$275
VOCs (11 units)	\$1,650
SVOCs (11 units)	\$2,970
 Methane Headspace (11 units) 	\$1,100
– QA/QC samples/event	\$2,750
Total for 1 MW sampling event	\$17,540
Total for 2 events	\$35,080

Monitor Well Installation Estimated Costs: Summary

•	Project Management	\$32,602

Health & Safety Plan \$5,000

\$4,000 Rig Mobilization

 Draft & Final Reports \$45,000

Hydrophysical Testing \$88,000

\$100,000 Gas Mudlogging

IDW Disposal Estimate \$60,000

Downhole Camera \$13,580

\$831,762 AOI #1

\$209,515 AOI #2

\$150,825 **AOI #3**

\$125,060 AOI #4

\$463,925 AOI #5

\$148,785 AOI #6

\$2,278,054 **Estimated Total**

Project Management \$32,602

Health & Safety Plan \$5,000

• Total \$37,602

• Rig Mobilization \$4,000

• Total \$4,000

- Assume driller will mobilize rig 1X from home base unless unable to install all MW's during same mobilization
- Assume mobilization charges for rig & support vehicle

Draft Report

\$40,000

- Assume a single report
- Report to include: well logs, potentiometric maps, GPS coordinates, site photos, maps & figures, data QA/AC
- Final Report

\$5,000

- Final report to include edits based on WDEQ comments
- Total

\$45,000

- Hydrophysical Testing of Deep Borehole:
 - Cost/deep borehole (11)

\$88,000

- IDW (Investigation Derived Waste) Disposal
 - \$10,000 per AOI

\$60,000

- Gas Mudlogging
 - \$4,000/day drilling, est. 25 days

\$100,000

Total for 11 deep boreholes

\$248,000

Downhole camera of DWW

- \$13,580
- Assumes 1 field tech @\$80/hr; 3 MW's sampled/day (10 hr day); two 6 hr travel days; Assumes vehicle @\$90/day
- Assumes two techs @\$150/hr for two and 6 days per diem @\$145/day; vehicle 6 days @\$90/day
- Assumes rental of downhole camera at \$1,000/wk
- Total equipment cost

\$13,580

- Onsite geologist total \$74,327
- Assumes 39 field days/6 separate AOIs
- Assumes 1 field geologist @\$100/hr for a total of 39 field days @10 hrs/day
- Assumes 39 days per diem @\$145/day
- Assumes 39 days per vehicle @\$90/day
- Assumes one person gas mudlogging unit onsite where applicable during MW installation includes geologist @\$4,000/day for 25 days

AOI #1: (b)(6) privacy [Landowner name]

Area

Cost Estimates:

•	Drilling	(# of	units:	3)	\$450,000
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Assume 4,500' Total Depth

AOI #2: (b)(6) privacy [Landowner name

Cost Estimates:

\$110,000 Drilling (# of units: 2)

\$82,500 Completion

\$6,000 Development

\$9,880 Labor

 Field Equipment \$1,135

\$209,515 Total Estimated Cost AOI #2:

Assume 1100' Total Depth

AOI #3: (b)(6) privacy [Landowner name]

Area

Cost Estimates:

\$81,000 Drilling (# of units: 1)

\$60,750 Completion

\$3,000 Development

\$4,940 Labor

\$1,135 Field Equipment

\$150,825 Total Estimated Cost AOI #3:

Assume 810' Total Depth

AOI #4:

(b)(6) privacy [Landowner name]

Cost Estimates:

•	Drilling	(# of	units: 1)	\$	65,000	J
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Assume 650' Total Depth

AOI #5:

(b)(6) privacy [Landowner name]

Cost Estimates:

• Drilling (# of units: 2) \$250,000

• Completion \$187,500

Development \$8,000

• Labor \$17,290

• Field Equipment \$1,135

Total Estimated Cost AOI #5: \$463,925

Assume 2,500' Total Depth

AOI #6:

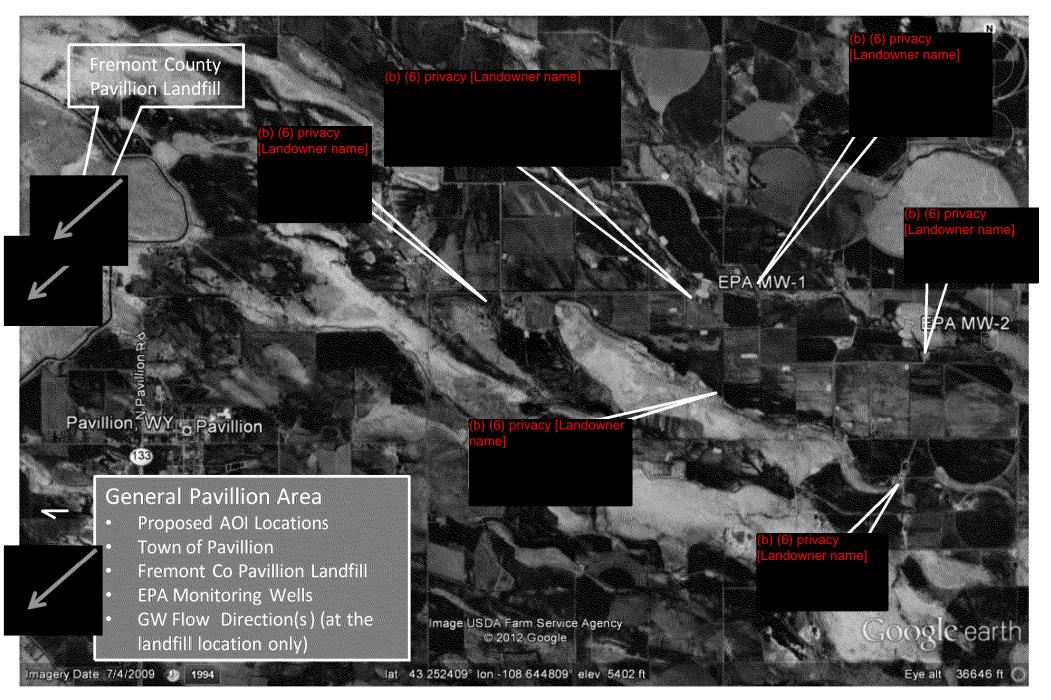
(b)(6) privacy [Landowner name]

Cost Estimates:

•	Drilling	(# of	units: 1)	Ç	80,500
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Assume 805' Total Depth

OPTIONAL ADDITIONAL GROUNDWATER INVESTIGATIONS



OPTIONAL ADDITIONAL GROUNDWATER INVESTIGATIONS

Site #1 PAVILLION LANDFILL

Issue: Review of available groundwater data near the former Pavillion landfill shows a lack of down gradient sampling data. Pavillion landfill is likely hydrologically up gradient of the Pavillion Gas Field, and was unlined.

- Install one or two monitoring well sets down gradient of the landfill
- Semi-annual sampling of wells for TPH-GRO and DRO, VOCs, SVOCs and Metals

Site #2 Production Pit

Issue: This facility was closed as per WOGCC requirements and is not in the VRP. The GW was not sampled.

- Install two monitoring well sets down gradient of the pit
- Semi-annual sampling of wells for TPH-GRO and DRO, VOCs, SVOCs and Metals

Costs were not included in the final estimation for AOI investigation

- 4 MW's of 80'-100' depths each
- No gas mudlogging required; GW monitoring only
- Estimated Total Cost: \$95,000

QUESTIONS?

SUMMARY



Semi-Annual Cistern Qualification DWW Sampling (General Groundwater Quality) -Voluntary Program-

- Sampling Labor (1 Event w/ 12 DWW's)
 - Assumes 1 field tech @\$80/hr; 5 DWW's sampled/10 hr day; 1 DWW/hr
 - · Request two field techs for safety considerations
 - 2 travel days of 6 hrs/day; 5 days per diem @\$145/day
 - Vehicle for 5 days @\$90/day
 - Field Equipment for the Week (horriba @\$300/wk)
 - Assumes All DWW's Sampled During Same Mobilization
- Subtotal for Field Labor/Event \$3,800
- Laboratory (12 DWW's)

_	TPH-DRO @\$75/DWW	\$900
-	TPH-GRO @\$75/DWW	\$900

TPH-DRO silica gel @\$75/DWW \$900

SVOCs @\$270/DWW \$3,240

VOCs @\$150/DWW \$1,800
 Methane Headspace @\$100/DWW \$1,200
 Metals (As, Fl. U. Nitrates) \$900

Metals (As, Fl, U, Nitrates) \$9

• \$75/DWW w/1 hr/DWW

– QA/QC samples/event \$300

• 1 blank duplicate/20 DWW's or single event

Subtotal for Laboratory Analysis/Event \$10,140

Total for 1 Event of 12 DWW's \$13,940

NOTE: The 37 DWW's included in the initial EPA sampling program included multiple stock & domestic wells at the program included multiple stock are domestic wells at the program and program included multiple stock.